

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

United States District Court
Southern District of Texas
FILED

FEB 23 2016

UNITED STATES OF AMERICA

§

David J. Bradley, Clerk of Court

vs

§

CRIMINAL NO.

B-16-124

**MADELEY GARCIA-NUNEZ
MARIA DOLORES GARCIA**

§

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

On or about January 29, 2016, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendants,

**MADELEY GARCIA-NUNEZ,
and
MARIA DOLORES GARCIA,**

did knowingly and intentionally conspire and agree with persons known and unknown to the Grand Jurors to knowingly and intentionally possess with intent to distribute a quantity less than fifty (50) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(D).

COUNT TWO

On or about January 29, 2016, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**MADELEY GARCIA-NUNEZ,
and
MARIA DOLORES GARCIA,**

did knowingly and intentionally possess with intent to distribute a quantity less than fifty (50) kilograms, that is, approximately 22.32 kilograms (49.23 pounds) of marihuana, a Schedule I

controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT THREE

On or about January 29, 2016, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendants,

**MADELEY GARCIA-NUNEZ,
and
MARIA DOLORES GARCIA,**

did knowingly and intentionally conspire and agree with persons known and unknown to the Grand Jurors to import a controlled substance into the United States of America from a place outside thereof, that is, from the country of Mexico, a quantity less than fifty (50) kilograms of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), and 960(b)(1).

COUNT FOUR

On or about January 29, 2016 in the Southern District of Texas, and within the jurisdiction of the Court, Defendants,

**MADELEY GARCIA-NUNEZ,
and
MARIA DOLORES GARCIA,**


did knowingly and intentionally import a controlled substance into the United States of America from a place outside thereof, that is, from the country of Mexico, in that they did import into the United States a quantity less than fifty (50) kilograms, that is, approximately 22.32 kilograms (49.23 pounds) of marijuana, a Schedule I, controlled substance.

In violation of Title 21, United States Code, Sections 952(a) and 960(b)(1), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY



JASON CORLEY
Assistant United States Attorney